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April 24, 2023

VIA ECF

Honorable Jennifer H. Rearden United States District Court Southern District of New York 500 Pearl Street, Room 1010 New York, New York 10007 Defendant's request on consent to extend the deadline to respond to the Complaint (*see* ECF No. 44) is GRANTED. By June 16, 2023, Defendant shall either respond to the Complaint or file a letter-motion requesting an additional extension of the deadline to answer. Insofar as Defendant's April 24, 2023 letter-motion seeks other relief, these requests have been addressed by Magistrate Judge Lehrburger. *See* ECF No. 46. The Clerk of Court is directed to terminate ECF No. 44.

Jennyer-A. Rearden May 2, 2023

SO ORDERED.

Re: Jasmine Baldwin v. Computer Generated Solutions, Inc. Case No. 1:23-cv-00128-JHR

Dear Judge Rearden:

This firm represents Defendant Computer Generated Solutions, Inc. ("Defendant" or "CGS") in the above-referenced matter. We write, jointly with Plaintiffs and pursuant to Rule 2.E. of Your Honor's Individual Rules of Practice in Civil Cases, to respectfully request an adjournment of current deadlines and a short stay of proceedings while the parties continue to discuss settlement. The parties' respective counsel have had multiple discussions regarding settlement and have just agreed on the exchange of an anonymized sampling of data for certain members of the putative class. The parties believe that the production of this data will facilitate further meaningful settlement discussions. Defendant is in the process of preparing this data, which is voluminous, and intends to produce same to Plaintiffs as soon as possible.

In light of the foregoing developments, the parties respectfully request a brief stay of proceedings, including the upcoming settlement conference currently scheduled before May 2, 2023 (and the corresponding deadline for the parties' to submit a pre-settlement statement on April 25), and Defendant's deadline to respond to the Complaint on May 16, 2023. Once Plaintiffs' counsel has had an opportunity to review and analyze the data Defendant is preparing, the parties are hopeful that a settlement conference before Magistrate Judge Lehrburger, if necessary, will be more productive with respect to helping the parties reach a resolution. This is Defendant's third request for an extension of time of its deadline to respond to the Complaint, and Plaintiffs consent and join Defendant's request.

Honorable Jennifer H. Rearden, U.S.D.J. April 24, 2022 Page 2

Respectfully submitted,

/s/ Paul Piccigallo

Paul R. Piccigallo Shareholder

cc: Counsel of Record (via ECF)